



- [16] KAI ELIJAH RAMOS )
- [17] WALTER THOMAS BOWEN, JR. )
- [18] FRANK JEFFREY KELLY, JR. )  
a/k/a "LITTLE MAN" )

## INDICTMENT

## COUNT ONE

## THE GRAND JURY CHARGES:

Beginning on a date unknown to the Grand Jury, but not later than in or about November 2012, and continuing thereafter until on or about March 11, 2015, in the Middle District of Tennessee and elsewhere, [1] DONALD DUANE BUCHANAN, JR. a/k/a "DONALD GAINS" a/k/a "RAY RHODES"; [2] BENJAMIN EDWARD HENRY BRADLEY; [3] FELICIA ANN JONES a/k/a "AUNTIE"; [4] ERIC ANTHONY MCEWEN a/k/a "E"; [5] PAMELA O'NEAL; [6] BERNADETTE BRADLEY a/k/a "BERNADETTE NICHOLE COLLEY"; [7] GENE ROLAND HARDWICK; [8] HOWARD BRONS III; [9] ASHLEY KAYE ALDRIDGE; [10] ANDREW BRADLEY FROOME; [11] JAMES EDWARD JOHNSON II a/k/a "RED"; [12] BOBBY DEANDRAE ROBERTSON a/k/a "B.O."; [13] JONATHAN LAMAR MOORE a/k/a "J-BOY"; [14] ROBERT EDWIN HAMPTON; [15] TONY WADE HOLBROOKS; [16] KAI ELIJAH RAMOS; [17] WALTER THOMAS BOWEN, JR.; and [18] FRANK JEFFREY KELLY, JR. a/k/a "LITTLE MAN" did combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to unlawfully, knowingly, and intentionally possess with intent to distribute and to distribute controlled substances, including Oxycodone and Oxymorphone, both Schedule II

controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning on a date unknown to the Grand Jury, but not later than in or about November 2012, and continuing thereafter until on or about March 11, 2015, in the Middle District of Tennessee and elsewhere, **[1] DONALD DUANE BUCHANAN, JR. a/k/a “DONALD GAINS” a/k/a “RAY RHODES”; [2] BENJAMIN EDWARD HENRY BRADLEY; and [3] FELICIA ANN JONES a/k/a “AUNTIE”** did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: Knowingly conducting and attempting to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is the unlawful distribution of Schedule II controlled substances, with the intent to promote the carrying on of the said specified unlawful activity, that is the distribution of Schedule II controlled substances, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION ONE

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of Count One, **DEFENDANTS [1] DONALD DUANE BUCHANAN, JR. a/k/a "DONALD GAINS" a/k/a "RAY RHODES"; [2] BENJAMIN EDWARD HENRY BRADLEY; [3] FELICIA ANN JONES a/k/a "AUNTIE"; [4] ERIC ANTHONY MCEWEN a/k/a "E"; [5] PAMELA O'NEAL; [6] BERNADETTE BRADLEY a/k/a "BERNADETTE NICHOLE COLLEY"; [7] GENE ROLAND HARDWICK; [8] HOWARD BRONS III; [9] ASHLEY KAYE ALDRIDGE; [10] ANDREW BRADLEY FROOME; [11] JAMES EDWARD JOHNSON II a/k/a "RED"; [12] BOBBY DEANDRAE ROBERTSON a/k/a "B.O."; [13] JONATHAN LAMAR MOORE a/k/a "J-BOY"; [14] ROBERT EDWIN HAMPTON; [15] TONY WADE HOLBROOKS; [16] KAI ELIJAH RAMOS; [17] WALTER THOMAS BOWEN, JR.; and [18] FRANK JEFFREY KELLY, JR. a/k/a "LITTLE MAN", jointly and severally, shall forfeit to the United States of America:**

- A. pursuant to Title 21, United States Code, Section 853(a)(1), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of violation of Title 21, United States Code, Section 846, including but not limited to a money judgment in an amount to be determined, representing the amount of gross drug proceeds obtained as a result of such offense; and
- B. pursuant to Title 21, United States Code, Section 853(a)(2), any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. If any of the property described above, as a result of any act or omission of **DEFENDANTS [1] DONALD DUANE BUCHANAN, JR. a/k/a "DONALD GAINS" a/k/a "RAY RHODES"; [2] BENJAMIN EDWARD HENRY BRADLEY; [3] FELICIA ANN**

JONES a/k/a "AUNTIE"; [4] ERIC ANTHONY MCEWEN a/k/a "E"; [5] PAMELA O'NEAL; [6] BERNADETTE BRADLEY a/k/a "BERNADETTE NICHOLE COLLEY"; [7] GENE ROLAND HARDWICK; [8] HOWARD BRONS III; [9] ASHLEY KAYE ALDRIDGE; [10] ANDREW BRADLEY FROOME; [11] JAMES EDWARD JOHNSON II a/k/a "RED"; [12] BOBBY DEANDRAE ROBERTSON a/k/a "B.O."; [13] JONATHAN LAMAR MOORE a/k/a "J-BOY"; [14] ROBERT EDWIN HAMPTON; [15] TONY WADE HOLBROOKS; [16] KAI ELIJAH RAMOS; [17] WALTER THOMAS BOWEN, JR.; and [18] FRANK JEFFREY KELLY, JR. a/k/a "LITTLE MAN":

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property, and it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the above named **DEFENDANTS**, up to the value of said property listed above as subject to forfeiture.

FORFEITURE ALLEGATION TWO

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of Count Two, **DEFENDANTS [1] DONALD DUANE BUCHANAN, JR. a/k/a “DONALD GAINS” a/k/a “RAY RHODES”; [2] BENJAMIN EDWARD HENRY BRADLEY; and [3] FELICIA ANN JONES a/k/a “AUNTIE”**, jointly and severally, shall forfeit to the United States of America: pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the violation of Title 18, United States Code, Section 1956(h) (conspiracy to commit money laundering), or any property traceable to such property including but not limited to proceeds of the violation and including but not limited to a money judgment in an amount to be determined, representing the property involved in a violation of Title 18, United States Code, Section 1956(h) (conspiracy to commit money laundering), or any property traceable to such property.

3. If any of the property described above, as a result of any act or omission of **DEFENDANTS [1] DONALD DUANE BUCHANAN, JR. a/k/a “DONALD GAINS” a/k/a “RAY RHODES”; [2] BENJAMIN EDWARD HENRY BRADLEY; and [3] FELICIA ANN JONES a/k/a “AUNTIE”**:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property, and it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the above named **DEFENDANTS**, up to the value of said property listed above as subject to forfeiture.



 FOREPERSON

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DAVID RIVERA  
UNITED STATES ATTORNEY

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CECIL W. VANDEVENDER  
ASSISTANT UNITED STATES ATTORNEY